



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Rachael Mamula
DOCKET NO.: 21-30100.001-R-1
PARCEL NO.: 17-05-117-057-1001

The parties of record before the Property Tax Appeal Board are Rachael Mamula, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, Ltd. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$4,894
IMPR.: \$41,606
TOTAL: \$46,500

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2021 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a residential condominium unit that is located in a 3.5-story condominium building of masonry exterior construction that contains 3 units. The condominium building is approximately 21 years old. The subject unit contains 1,008 square feet of living area and features one bedroom, 1.5 baths, central air conditioning, two fireplaces, and a 1-car garage.¹ The subject has a 47.98% interest in the common elements of the condominium property. The property has a 3,000 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal of the subject property estimating a market value of \$465,000 as

¹ The description of the subject property was gleaned from the appraisal submitted by the appellant.

of January 1, 2021. The appraisal was prepared by Gary Nusinow, a Certified General Real Estate Appraiser who inspected the interior and exterior of the subject property. The appraiser reported the property rights appraised were fee simple interest and the purpose of the appraisal for an ad valorem tax assessment. In estimating the subject's market value, the appraiser utilized the sales comparison approach only.

Under the sales comparison approach, the appraiser selected four comparable sales of residential condominium units located less than 1 block to .43 of a mile from the subject. The comparable sales are condo units ranging in size from 950 to 1,200 square feet of living area and are 14 to 20 years old. Each comparable has two bedrooms, 1.5 bathrooms, central air conditioning, one or two fireplaces, and a 1-car or a 2-car off street parking. The comparables sold from January 2020 to February 2021 for prices ranging from \$387,500 to \$525,000 or from \$345.37 to \$484.21 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject in location, condition, bathroom count, gross living area, and/or features to arrive at adjusted prices from \$429,500 to \$489,800. Based on this analysis, the appraiser concluded a value for the appraised property of \$465,000 as of January 1, 2021.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$54,531. The subject's assessment reflects a market value of \$545,310 or \$542.06 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a sales analysis prepared by Marco Fernandez, an analyst with the Cook County Board of Review. The analyst provided sales data on 2 comparables of residential units, one of which was the subject unit, that sold in the subject's condominium complex that contains a total of 3 units. The sales occurred in March and May 2022 for prices of \$525,000 and \$537,500 with a total consideration of \$1,062,500. The board of review analysis indicated these 2 units had a total 73.99% ownership interest in the condominium property. The total consideration was then divided by the total percentage of interest of ownership in the condominium property for the units that sold to arrive at an indicated full value for the property of \$1,436,005. The analyst then applied the percentage of interest of ownership for the unit under appeal of 47.98% to arrive at a full value of \$688,995 and an assessment of \$68,900, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence the board of review requested confirmation of the subject's assessment.

In a 3-page rebuttal brief, the appellant's counsel argued the board of review only submitted a list of 2 raw, unadjusted sales within the subject building. Counsel further contends there were no property descriptions for the board of review sales which would allow PTAB to draw any reasonable or reliable comparison to the subject. In addition, counsel critiqued the board of review's analysis noting the methodology does not consider the square footage, upgrades, unit layout, condition or number of bedrooms. For these reasons the appellant's counsel contends the subject's assessment should reflect the appraised value.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant provided an appraisal of the subject property; and the board of review provided a sale analysis of 2 comparable sales within the subject's condominium complex, one of which was the sale of the subject.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appraiser utilized four sales of condominium units and adjusted them for differences when compared to the subject. The subject's assessment reflects a market value of \$545,310 or \$542.06 per square foot of living area, including land, which is above the appraised value. The Board also gives less weight to the board of review's analysis at it included two sales, one of which was the subject sale that occurred approximately 15 and 17 months after the January 1, 2021, assessment date and thus, they are less likely to be reflective of market value as of that date. The Board finds the subject property had a market value of \$465,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10 shall apply. (86 Ill.Admin.Code §1910.50(c)(2)). Based on this evidence the Board finds a reduction in the subject's assessment is justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: _____

August 19, 2025



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

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